

EXHIBIT 2

From: [Jonathan Mitchell](#)
To: [Ellis Herington](#)
Cc: [Dwain K. Rogers](#); [Matt Rienstra](#); [Ellen Leonida](#); [Andrew Levine](#); [Max Bernstein](#); [Marissa Benavides](#); [Shannon Morrissey](#); [Kayna Levy](#); [Maria Calaf](#); [Ryan Botkin](#); [Katherine Chiarello](#)
Subject: Re: Little v. Llano County - meet and confer
Date: Friday, April 14, 2023 2:30:27 PM

***** EXTERNAL MESSAGE *****

Opposed.

On Apr 14, 2023, at 11:18 AM, Ellis Herington <herington@braunhagey.com> wrote:

Jonathan,

Thanks again for the meet and confer earlier. Please send the Zoom recording over when it is available.

Additionally, I write regarding the deposition we previously took of you on March 31. Consistent with our position on the documents Defendants have withheld as privileged, we intend to move to compel your second deposition to obtain testimony as to certain deposition questions you refused to answer on privilege grounds. These include communications concerning your donation of books to the library system and your legislative drafting work (and related documents). Please confirm whether you will oppose this motion.

Best,
Ellis

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